

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JAMES CODY, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Cause No. 4:17-cv-2707
)	
THE CITY OF ST. LOUIS,)	
)	
Defendant.)	

**AMENDED NOTICE OF DEPOSITION OF
DEFENDANT CITY OF ST. LOUIS PURSUANT TO RULE 30(b)(6)**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of Defendant City of St. Louis (“Defendant” or “St. Louis”) at Alaris Litigation Services, 711 North 11th Street, St. Louis, Missouri, on August 13, 2018 commencing at 9:00 a.m. and continuing until completed or continued by agreement of counsel. The deposition will be taken upon oral examination will be recorded by stenographic means before a notary public or other officer duly authorized by law to administer oaths. Defendant City of St. Louis shall designate one or more officers, directors, managing agents, or other persons who consent to testify on its behalf as to the matters set forth herein below, and are required within five (5) days before the deposition to identify their designee(s), including names, titles, or positions, and the matters on which each designee will provide testimony. You are invited to attend and participate.

DEFINITIONS

The definitions specified in Plaintiffs’ First Set of Interrogatories and First Requests for Production shall apply for purposes of this notice.

TOPICS

Counsel for Plaintiffs will examine Defendant's corporate representative(s) pursuant to Federal Rule 30(b)(6) and for any use permitted by Federal Rule 32 about the following:

1. Records Retention Supervisor for the Division of Corrections Jamie Lambing, and/or a corporate designee most knowledgeable about:

a. The locations, custodians, and methods by which electronically stored information related to the Workhouse is kept for the period of January 1, 2012 to the present and with regard to the following topics:

- Booking and inmate classification and management;
- Maintenance;
- Inmate Complaints;
- Internal Affairs;
- Budgeting/finance;
- Human Resources;
- Compliance;
- Email Communications;
- Temperature readings in the Workhouse; and
- Audio/video surveillance.

b. The locations, custodians, and methods by which non-electronic information (i.e. paper documents and tangible items) related to the Workhouse is kept for the period of January 1, 2012 to the present with regard to the following topics:

- Booking and inmate classification and management;
- Maintenance;
- Inmate Complaints;
- Internal Affairs;
- Budgeting/finance;
- Human Resources;
- Compliance;
- Email Communications;
- Temperature readings in the Workhouse; and
- Audio/video surveillance.

2. Custodians of the inmate complaints and other materials, of which three boxes were made available on July 27, 2018 for inspection at City Hall.

3. Defendant's document and data retention, authentication, and destruction policies in effect at any time between January 1, 2009 through the present that affect or are related to any of the information and documents encompassed in the above-listed request.

Dated: July 30, 2018

ARCHCITY DEFENDERS, INC.

By: /s/ Nathaniel R. Carroll

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of July, 2018 the undersigned served true and correct copies of the foregoing via email and by United States Mail, postage prepaid, to attorneys for all parties of record at the following address:

ST. LOUIS CITY COUNSELOR'S OFFICE

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